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16 Attorneys for Plaintiff
17 UNITED STATES OF AMERICA

18 UNITED STATES DISTRICT COURT

19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 IBRAHIM AMEEN ALHUSSEINI,

24 Defendant.

No. 24-MJ-06166-DUTY

STIPULATION REGARDING REQUEST FOR
CONTINUANCE OF FILING DATE FOR
INFORMATION OR INDICTMENT PURSUANT
TO SPEEDY TRIAL ACT

25
26 Plaintiff United States of America, by and through its counsel
27 of record, the United States Attorney for the Central District of
28

1 California, the Chief of the Fraud Section of the U.S. Department of
2 Justice Criminal Division, Assistant United States Attorneys Brett
3 A. Sagel and Nisha Chandran, and U.S. Department of Justice Trial
4 Attorneys Theodore M. Kneller and Adam L.D. Stempel, and defendant
5 IBRAHIM AMEEN ALHUSSEINI ("defendant"), both individually and by and
6 through his counsel of record, Ronald L. Cheng, Aaron S. Dyer, and
7 David K. Willingham, hereby stipulate as follows:

8 1. Defendant was arrested on October 7, 2024, and the
9 government filed a complaint on October 8, 2024, alleging a violation
10 of 15 U.S.C. §§ 78j(b), 78ff, and 17 C.F.R. § 240.10b-5. (Dkt. 1.)
11 Defendant appeared, represented by his counsel of record, for an
12 initial appearance on that complaint on October 8, 2024, which was
13 continued to October 10, 2024, October 16, 2024, and October 21,
14 2024, at defendant's request. (Dkts. 4, 8, 10, 15.) At defendant's
15 October 16, 2024 appearance, defendant waived preliminary hearing.
16 (Dkt. 11.)

17 2. At defendant's October 21, 2024 appearance, defendant was
18 granted bond along with other conditions set by the Court. (Dkt.
19 15.) The Court set a post-indictment arraignment for November 25,
20 2024. (Id.)

21 3. The Speedy Trial Act, 18 U.S.C. § 3161, originally required
22 that an information or indictment be filed on or before November 6,
23 2024.

24 4. By this stipulation, defendant moves to continue the date
25 by which an information or indictment must be filed to December 6,
26 2024, and move further for a continuance of the post-indictment
27 arraignment to December 10, 2024.

1 5. Defendant requests the continuance based upon the following
2 facts, which the parties believe demonstrate good cause to support
3 the appropriate findings under the Speedy Trial Act:

4 a. The ends of justice outweigh the interest of the
5 public and the defendant in the filing of an information or
6 indictment within the original date prescribed by the Speedy Trial
7 Act because:

8 i. Counsel of record Ronald L. Cheng and Aaron S.
9 Dyer represent that, prior to being able to meaningfully consult with
10 defendant regarding the case, including the possibility of entering
11 into a plea agreement prior to or concurrent with the filing of an
12 indictment or information in this case, they have needed additional
13 time to confer with defendant.

14 ii. Counsel of record David K. Willingham was
15 retained by defendant on October 28, 2024. Counsel thus represents
16 that he requires additional time to counsel the defendant regarding
17 the case.

18 iii. The defendant, his counsel, and government
19 counsel require an additional 30 days, from November 6, 2024 to
20 December 6, 2024, to consider entering into a plea agreement prior to
21 or concurrent with the filing of an indictment or information in this
22 case; and

23 iv. The defendant and his counsel require additional
24 time for defense counsel to conduct and complete an independent
25 investigation of the case, advise the defendant, and prepare for a
26 trial in the event that a pretrial, pre-indictment resolution does
27 not occur. Defense counsel represent that failure to grant the
28

1 continuance would deny them reasonable time necessary for effective
2 preparation, taking into account the exercise of due diligence.

3 v. Defendant believes that failure to grant the
4 continuance will deny him adequate representation.

5 6. Based on the foregoing, the parties request that the Court
6 find that for the purpose of computing time under the Speedy Trial
7 Act, 18 U.S.C. § 3161(b), within which an information or indictment
8 must be filed, the time period of October 30, 2024, to December 6,
9 2024 is deemed excludable pursuant to 18 U.S.C. § 3161(h) because the
10 ends of justice served by granting a continuance outweigh the best
11 interest of the public and the defendant in a filing of an
12 information or indictment within the period specified in 18 U.S.C.
13 § 3161(b).

14 7. The parties agree and stipulate and request that the Court
15 find that nothing in this stipulation and order shall preclude a
16 finding that other provisions of the Speedy Trial Act dictate that
17 additional time periods be excluded from the period within which an
18 information or indictment must be filed. Moreover, the same
19 provisions and/or other provisions of the Speedy Trial Act may in the

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22 //

1 future authorize the exclusion of additional time periods from the
2 period within which an information or indictment must be filed.

3 IT IS SO STIPULATED.

4 Dated: October 29, 2024

Respectfully submitted,

5 E. MARTIN ESTRADA
United States Attorney

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7 MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

8
9 GLENN S. LEON
Chief, Fraud Section
U.S. Department of Justice

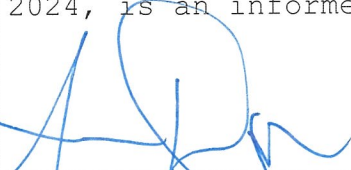
10
11 /s/

12 BRETT A. SAGEL
NISHA CHANDRAN
Assistant United States Attorneys

13
14 THEODORE M. KNELLER
ADAM L.D. STEMPEL
Trial Attorneys, Fraud Section
U.S. Department of Justice

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16 Attorneys for Plaintiff
UNITED STATES OF AMERICA

1 I am IBRAHIM AMEEN ALHUSSEINI's attorney. I have carefully
2 discussed every part of this stipulation and the continuance of the
3 date by which an information or indictment be filed with my client.
4 I have fully informed my client of his Speedy Trial rights. To my
5 knowledge, my client understands those rights and agrees to waive
6 them. I believe that my client's decision to give up the right for
7 an information or indictment to be filed earlier than December 6,
8 2024, is an informed and voluntary one.

9
10 
11 RONALD L. CHENG
12 AARON S. DYER
13 DAVID K. WILLINGHAM
Attorney for Defendant
IBRAHIM AMEEN ALHUSSEINI

10/31/24
Date

14
15
16 I have read this stipulation and have carefully discussed it
17 with my attorney. I understand my Speedy Trial rights. I
18 voluntarily agree to the continuance of the date by which an
19 information or indictment be filed, and give up my right for an
20 information or indictment to be filed earlier than December 6, 2024.

21
22 
23 IBRAHIM AMEEN ALHUSSEINI
24 Defendant

10/31/24
Date